

(Translation)



Anti-Fraud and Corruption Policies
Business Online Public Company Limited
As 14 December 2023

Reviewed by the Board of Directors of Business Online Public Company Limited

On December 14, 2023

Anti-Fraud and Corruption Policies

Business Online Public Company Limited is committed to anti-corruption by not tolerating any behavior concerning fraud and corruption. The Company has applied an anti-corruption policy within the organization for all the departments and individuals involved in its business operations to follow. The policies focus on the transparency and integrity of communication amongst staff and between departments, in order to avoid any inappropriate practices and any conflict against the principles of good corporate governance. Furthermore, the policy also opposes bribery of any form that may benefit the Company, with a disciplinary penalty imposed on those who offend these regulations.

Definition

“Corruption” means the use of acquired power or misuse of existing assets for the benefit of the company, themselves or related persons or which may cause damage to the interests of others.

“Bribery” means offering, promising or giving, soliciting or receiving benefits related to items of value either directly or indirectly to acquire business or to maintain any other benefits that are inappropriate according to the business ethics.

“Fraud” means fraudulently deceiving others by displaying false statements or concealing the true message which should have been told, and by such deception, obtaining property from the deceived person or others. or causing the deceived person or others to act or not act in a certain way.

1. Political Policies

The Company has established political guidelines as follows:

- 1.1. All members of the Company must fulfill their duties as a responsible citizen in accordance to constitutional law and other related laws.
- 1.2. All members may not participate in any political activity and may not express any opinions that may mislead a third party that the Company is involved with, or supports any political party or group, which may cause polarization within the Company and in society.
- 1.3. All members may not use the Company’s assets to support any political party or group in exchange for special privileges or wrongful benefits.

2. Policy for Giving and Receiving Gifts

The Company has established policies regarding giving and receiving gifts as follows:

- 2.1. Directors, executives and employees shall avoid accepting both monetary and non-monetary gifts from partners or from any individuals related to business of the Company, except as a festivity or as a holiday tradition.
- 2.2. Directors, executives and employees must not accept any personal payments or benefits from customers, business partners or from any individuals while working, or accept such benefits on behalf of the company.
- 2.3. Directors, executives and employees must not lend or borrow money, or raise money at the expense of the Company’s customers or business partners. The exception would be requesting loans from banks or financial institutions, as a customer of said financial institutions.
- 2.4. Giving or receiving donations or financial support must be transparent and legal, and should be made apparent that such donations or support funds are not used as an excuse for giving or receiving bribes.
- 2.5. The Company does not have a policy to offer money, gifts or special benefits of any form to its customers, partners, external agencies that are public and private, or any individuals in order to acquire a business deal. Exceptions include traditional networking, trade discounts and promotional projects of the Company.

3. Fraud Control Policy

- 3.1. The company has a policy and is firmly against fraudulent business operations.
- 3.2. Directors, executives and employees are responsible for detecting and preventing fraud. In case any transaction suspected to be fraudulent is found, the company must be reported.
- 3.3. Directors, executives and employees must strictly comply with the Information Security Requirement Guideline of the Company to prevent fraud that may occur through all online channels.

4. Whistleblowing Policies

The Company is determined to encourage its directors, executives and employees to operate business in a correct, transparent and fair manner, in which their transactions can be audited in accordance with good corporate governance and the business ethics of the Company.

The Company has established a policy for whistle blowing or reporting any misconduct or complaint. Supervisors and related departments may monitor and advise accordingly, and ensure that directors, executives, and employees are conducting appropriate behavior. Individuals who wish to whistle blow can report any suspicious activity that may directly or indirectly cause fraud or corruption within the Company. The Company has a mechanism to protect whistleblowers as well as keeping every report confidential. Any potential misconduct or any complaints can be notified through the following channels:

1. Written letters addressed to:
Mr. Anant Tangtatswas (Independent Director Vice Chairman and Chairman of the Audit Committee)
Business Online Public Company Limited
1023 MS Siam Tower, 32th Floor, Rama 3 Road
Chong Nonsri, Yannawa, Bangkok 10120

2. Emails may be sent to:

BOLwhistleblowing@bol.co.th

The complainant must specify details of the potential misconduct or complaint, together with the whistleblower's name, address and contact number.

The notified information from both channels will be directed to the Chairman of the Audit Committee.

Reviewed and approved according to the resolution of the Board of Directors No. 5/2023 dated 14 December 2023